

## **EXHIBIT B**

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EDWARD BENNETT WILLIAMS (1920-1988)  
PAUL R. CONNOLLY (1922-1978)

June 11, 2002

Mr. Edward Betancourt  
Director of Special Consular Services  
Department of State  
CAOCS/PRI  
Suite 2100  
1800 G Street, N.W.  
Washington, D.C. 20520

Attn: Luke Bellochi, Esq. (202) 312-9718

**Re: *Walker International Holdings Limited v. Republic of the  
Congo, et al.*, Civil Action No. 00-2987 (JR)**

Dear Mr. Betancourt:

This firm represents plaintiff Walker International Holdings ("Walker") in the above-referenced action. Pursuant to my June 11, 2002 conversation with Luke Bellochi, Esq., I am writing to explain that Walker is requesting service of process on the Republic of the Congo (the "Congo") and Caisse Congolaise D'Amortissement ("CCA") pursuant to 28 U.S.C. § 1608(a)(4), and that Walker has exhausted other methods of service under § 1608(a).

Section 1608(a)(1) is not applicable because there is no special arrangement for service of process. Section 1608(a)(2) is not applicable because the Congo is not a party to an applicable international convention on service of judicial documents. See <http://travel.state.gov/fsia.html>. Walker has attempted service of process under § 1608(a)(3). On April 11, 2002, the Clerk of the Court mailed a copy of the default judgment, and notice thereof, together with translations of each into the official language of the Congo, by registered mail, return receipt requested to the Congo and to CCA c/o the Head of the Ministry of Foreign Affairs of the Congo pursuant to § 1608(a)(3). See Ex. A. More than thirty days have elapsed, and we have not received confirmation of service.

WILLIAMS & CONNOLLY LLP

Mr. Edward Betancourt  
Director of Special Consular Services  
June 11, 2002  
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Accordingly, we respectfully request that the State Department effect service pursuant to § 1608(a)(4). Please give me a call if you have any questions. Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'T. J. Romero', with a stylized flourish at the end.

Tobin J. Romero

# **EXHIBIT**

# **A**

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**WASHINGTON, D.C. 20001**

**TO** *Boisse Congolaise L'Amortissement*  
*Rodolphe Adada BP 98*  
*Brazzaville, Congo*

PS Form 3806, February 1995 **Receipt for Registered Mail** (Customer Copy)  
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*Rodolphe Adada BP 98*  
*Brazzaville, Congo*

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